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CISO W. J. J. J.  
Date 8/2/2013IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION\_\_\_\_\_  
UNITED STATES )

v. )

ALI AL-TIMIMI )  
\_\_\_\_\_ )

Case No. cr-04-385

Hon. Leonie M. Brinkema

**DEFENDANT DR. ALI AL-TIMIMI'S MOTION TO COMPEL DISCOVERY RELATED  
TO ABU KHALID**

Defendant Dr. Ali al-Timimi, by and through undersigned counsel, respectfully moves this Court to enter an order requiring and directing Plaintiff United States to produce evidence requested by Dr. al-Timimi relating to "Abu Khalid," a.k.a. Muhammad Ajmal Khan. As more fully explained in the accompanying Memorandum in Support of this Motion, Dr. al-Timimi moves the Court pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny, as well as Federal Rule of Criminal Procedure 16.

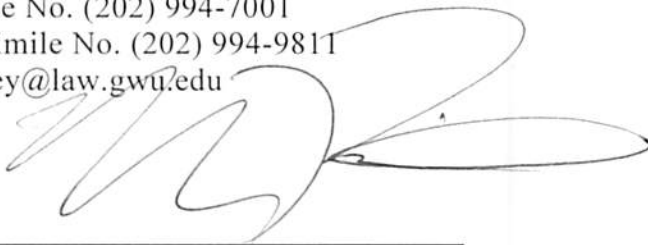
In its response to Dr. al-Timimi's recently filed motion to compel discovery, the government reiterated its claim that Dr. al-Timimi is not entitled to any further discovery. In light of the United States' previous refusal to provide this evidence, described in detail in the accompanying Memorandum, Dr. al-Timimi files this motion to compel based on evidence derived from public sources. According, Dr. al-Timimi respectfully asks for an order for disclosure of all evidence, including, but not limited to, any surveillance records, field reports, and recordings, relating to Muhammad Ajmal Khan's relationship with Dr. al-Timimi, Seifullah Chapman, Pal Singh (or Palvinder Singh), and Ali Asad Chandia; and information regarding visits to the United States by Muhammad Ajmal Khan or Pal Singh from 2001-2003. The

Defendant also requests discovery on the use by Muhammad Ajmal Khan of the email address johninformation@yahoo.co.uk in relation to individuals associated with the Virginia Jihad investigation or Dr. al-Timimi.

Respectfully submitted,

Dr. Ali al-Timimi  
By Counsel

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Dated: August 2, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of August, 2013, the foregoing was given to the court security official in compliance with prior court orders for filing and delivery to both the Court and opposing counsel.

A handwritten signature in black ink, appearing to read 'Vishant Manu Krishnan', is written over a horizontal line.

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